

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED
U.S. DISTRICT COURT
INDIANAPOLIS DIVISION
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SOUTHERN DISTRICT
OF INDIANA
LAURA A. BRIGGS
CLERK

RAJESH KATAKDAUNDE, Plaintiff, v. HUNTER WARFIELD, INC., Defendant.	CASE NO. 1:10-cv-0590 WTL-JMS
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COMPLAINT

I. INTRODUCTION

1. This is an action for statutory and actual damages, costs of the action and a reasonable attorney's fee brought by Rajesh Katakdaunde for violation of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq., by Defendant.

II. JURISDICTION

2. Jurisdiction of this court arises under 15 U.S.C. § 1692k(d), 28 U.S.C. §§ 1331 and 1337.

III. PLAINTIFF

3. Plaintiff Rajesh Katakdaunde is a natural person residing in Indianapolis, Indiana.

IV. DEFENDANT

4. Defendant Hunter Warfield, Inc. (hereinafter "Hunter Warfield") is a for-profit foreign corporation with its principal place of business in Tampa, Florida.
5. At all times referenced herein, Hunter Warfield was operating as a debt collector in the State of Indiana as defined by 15 U.S.C. § 1692a(6).

V. STATEMENT OF FACTS

6. Hunter Warfield placed a debt on Plaintiff's credit report that he does not owe.

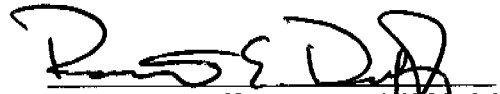
VI. CLAIMS FOR RELIEF

A. Fair Debt Collection Practices Act

7. Plaintiff repeats, re-alleges and incorporates by reference paragraphs one through six above.
8. Hunter Warfield violated the Fair Debt Collection Practices Act. These violations include, but are not limited to:
 - a. Attempting to collect a debt that Plaintiff does not owe, in violation of 15 U.S.C. § 1692d;
 - b. Falsely representing the amount and legal status of a debt, in violation of 15 U.S.C. § 1692e;
 - c. Attempting to collect an amount not expressly authorized by the agreement creating the debt or permitted by law, in violation of 15 U.S.C. § 1692f.
9. As a result of these violations of the Fair Debt Collection Practices Act, Defendant is liable to Plaintiff for his actual damages, statutory damages, costs, attorney fees and all other appropriate relief.

WHEREFORE, Plaintiffs respectfully request that the Court enter judgment in their favor and against Defendant in an amount that will compensate them for their actual damages, statutory damages, costs, attorney fees and all other appropriate relief.

Respectfully submitted,


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